

Marcus Leinart
 State Bar No. 00794156
 Leinart Law Firm
 11520 N. Central Exprwy, Ste 212
 Dallas, TX 75243
 469.232.3328 Phone
 214.221.1755 Fax
 ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 FORT WORTH DIVISION**

IN RE: §
IZISHILL BOLDON, JR §
LATANYA ACY BOLDON § **CASE NO. 15-43536-MXM-13**
Debtors § **CHAPTER 13**

DEBTORS' MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION
DATE: October 19, 2016

Pursuant to 11 USC 1329 the Debtors request the following modification(s) to the Debtors' original or last modified Chapter 13 Plan.

1. History of Case.

Petition Date:9/1/2015	Total Paid In (Recd to Date): \$42,200.00
First Meeting Date: 10/14/2015	Amount Due to be Current: \$
Confirmation Date:11/13/2015	Plan Base (Current): \$95,325.00

2. Current Plan Payment to Trustee Amounts and Term:

<u>Start Date</u>	<u>Number Periods</u>	<u>Amount</u>	<u>How Often</u>
10/01/2015	15	\$1,510.00	Monthly
01/01/2017	45	\$1,615.00	Monthly

3 New Plan Payment to Trustee Amount and Term*:

The plan payment amount will be changed to \$ PER MONTH TO THE TRUSTEE:

<u>Start Date</u>	<u>Number Periods</u>	<u>Amount</u>	<u>How Often</u>
10/1/2016	1	\$27,100.00	One time
11/1/2016	47	\$ 775.00	Monthly

NEW PLAN BASE:

\$78,625.00

Debtors' new payment start date may not be more than 30 days from above date.

* Debtors in cases filed before 10.17.05 must pay all projected monthly disposable income into the plan for no less than 36 months (unless unsecured claims are being paid 100%), and the plan term shall not exceed 60 months.

* Debtors in cases filed on and after 10.17.05 must pay their projected monthly disposable income into the plan for the benefit of unsecured creditors for no less than the Applicable Commitment Period (36 months or 60 months)(unless unsecured claims are being paid 100%), and the plan term shall not exceed 60 months.

4. Unsecured Creditors in cases filed before 10.17.05 are to be paid a pro rata share of debtors' projected monthly disposable income times 36, after payments of all administrative, priority, secured and any special class unsecured claims provided for payment by the Trustee under the plan.
5. Unsecured Creditors in cases filed on or after 10.17.05 are to be paid a pro rata share of the Unsecured Creditors' Pool consisting of all debtors' projected monthly disposable income to be received in the Applicable Commitment Period.
6. PROVIDE FOR OR MODIFY TREATMENT OF SECURED CLAIMS (CRAM DOWN) TO:
7. PROVIDE FOR OR MODIFY TREATMENT OF SECURED CLAIMS (NO CRAM DOWN) TO:

P/M	Creditor Name	Claim Amount	Value	Interest Rate	Treatment
M	Internal Revenue	\$35,300.33	\$35,300.33		Direct pay
P	Wells Fargo	\$6,626.00	\$398,500.00		In plan
M	Tarrant County	\$6,229.78	\$76,100.00		Direct pay
P	Bank of America	\$3,920.52	\$133,900.00		In plan

8. PROVIDE FOR OR MODIFY TREATMENT OF PRIORITY CLAIMS TO:
9. Reason for Modification(s)
 - (1) To cure plan arrears to the Trustee through **(MONTH/YEAR)**
 - (2) To provide or modify treatment for Secured, Priority or Unsecured claim not previously provided for
 - (3) To make plan sufficient (based on allowed claims)
 - (4) To modify the Unsecured Creditors' Pool from \$____ to \$____.
 - (5) To modify percentage to Unsecured Creditors in a pre-10.17.05 case from ____% to ____%
 - (6) Other: Allow for a one time payment \$27,100.00. Pay 100% to unsecured creditors. Allow Wells Fargo and Bank of America thru the plan. Modify IRS and Tarrant County to pay direct. Property was sold and they are to be paid from the proceeds.
10. Debtors' attorney fees for this Modification:

Total amount of \$400.00, of which \$400.00 will be paid through the plan by the Trustee pro-rata, after payment of specified monthly payments and before any other pro-rata payments.

11. All other provisions as set forth in the last confirmed plan remain the same.

The automatic stay shall be lifted and the Trustee shall cease disbursement on account of any Surr (surrender) of collateral as indicated above, without further order of the Court as of the date of filing hereof, pursuant to General Order 2006-01, paragraph 4e.

OBJECTIONS

UNLESS A WRITTEN RESPONSE IF FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT (501 WEST TENTH STREET, FORT WORTH, TEXAS 76102 or 1100 COMMERCE STREET, DALLAS, TEXAS 75242), BEFORE 4:00 P.M. OF 11/16/2016 THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN.

DATED: October 19, 2016

Respectfully Submitted,

Leinart Law Firm
11520 N. Central Exprwy, Ste 212
Dallas, TX 75243-6113
469.232.3328 Phone
214.221.1755 Fax

By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2016, I did serve a true and correct copy of the foregoing to the following interested parties and to those listed on the matrix as filed with the Court, by United States Mail, First Class:

DEBTORS

Izishill Boldon, Jr and Latanya Acy Boldon
5612 Bay Club Drive
Arlington, TX 76013

STANDING CHAPTER 13 TRUSTEE

Tim Truman
6851 N.E. Loop 820, Ste 300
N. Richland Hills, TX 76180-6608

UNITED STATES TRUSTEE

1100 Commerce St, Rm 976
Dallas, TX 75242

By: /s/ Marcus Leinart
Marcus Leinart
ATTORNEY FOR DEBTORS